

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States of  
America, et al.,

Defendants.

NO.

DECLARATION OF H.E.

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ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

**DECLARATION OF H.E.**

I, H.E., declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and I make this declaration based on my personal knowledge.

2. I live in Dakota County, Minnesota with my spouse D.E. and our two children.

3. My oldest child, Child A, is transgender. She was assigned male sex at birth but her gender identity is female.

4. My daughter told me and my spouse that she is transgender when she was 4-years-old. She selected a new name for herself when she was 5.5 years old.

5. My spouse and I were fortunate to find an experienced medical provider for Child A when she was 8 years old. My daughter has greatly benefited from the medical care that he has provided.

6. As my daughter got older, she relayed feelings of gender dysphoria and anxiety related to the idea of going through male puberty and presenting as masculine. When my daughter was 10 years old, her doctor recommended use of reversible puberty blockers to delay the onset of puberty. Beginning puberty blocking medication was key to ensuring my daughter's continued emotional, mental, and physical health.

7. When my daughter was in middle school, she observed her female peers going through puberty and expressed gender dysphoria about her lack of development due to the puberty blockers. Her medical provider recommended a low dose of estrogen to begin the female puberty process.

8. My daughter was overjoyed when she first got prescribed estrogen by her medical provider. She was excited because she was going to look like herself and her female peers. I

1 could see her joy and relief when she started her estrogen treatment. My daughter's happiness  
2 at being able to live in a body that matches her gender identity cannot be overstated.

3 9. My daughter has expressed that the gender-affirming care makes her feel great and  
4 like the person that she has always known she was. It would be devastating for her if she can  
5 no longer access the gender-affirming care because she would lose all that she has worked to  
6 become. My daughter has never expressed any regret about taking puberty blockers or  
7 estrogen.

8 10. I understand that the President has issued an Executive Order affecting and  
9 preventing gender affirming care for people under age 19. My daughter is aware of this policy,  
10 and it creates significant distress for her. Gender-affirming care has provided my daughter with  
11 a sense of safety because she is able to pass as female. If she were to lose access to that care,  
12 she is afraid that she would no longer be able to do so, which causes fear and anxiety about her  
13 safety.

14 11. Every child deserves to feel good about themselves and feel beautiful. It angers and  
15 saddens me that the Executive Order would take away my daughter's joy and the joy of other  
16 trans children by not allowing them to live in a body that reflects their gender identity.

17 12. The Executive Order creates anxiety and fear for my daughter since her access to  
18 the medical care that she relies on may change each time a new president is elected.

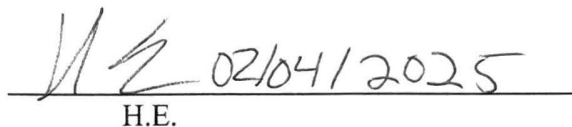
19 13. My spouse and I have started to consider moving out of the country to ensure that  
20 our daughter will be able to continue receiving gender-affirming medical treatment. Leaving  
21 the country would be incredibly difficult for myself and my family and disruptive for my  
22 children. My spouse was grew up in Minnesota, and we have made this state our home for 20  
23 years. But moving would be absolutely necessary to protect Child A's physical and mental  
24 health and her future.

1 years. But moving would be absolutely necessary to protect Child A's physical and mental  
2 health and her future.

3 14. I have decided to use initials in this declaration to protect my daughter and my  
4 family from any acts of hatred or violence. The anti-trans rhetoric is heightened, and I am  
5 worried that people would retaliate if they knew I was speaking out on behalf of my daughter  
6 in response to the Executive Order.

7  
8 I declare under penalty of perjury that the foregoing is true and correct.

9 DATED this 4th day of February 2025, in Dakota County, Minnesota.

10  
11  02/04/2025  
12 H.E.